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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(T. 18, U.S.C. § 2252(a)(4)(B))

ALDO BLAS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DOUGLAS SMITH, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On April 30, 2014, within the Eastern District of New York, the defendant ALDO BLAS (the "defendant"), did knowingly and intentionally possess matter containing one or more visual depictions, which visual depictions had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which were produced using materials which had been mailed, and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(4)(B))

The source of your deponent's information and the grounds for his belief are as follows:

1. I have been a Special Agent with HSI for approximately 10 years. I have been assigned to investigate violations of criminal law relating to the sexual exploitation of children. I have gained expertise in this area through training in classes and daily work related to these types of investigations. As part of my responsibilities, I have been involved in the investigation of several child pornography cases and have reviewed numerous photographs depicting children (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor.

2. I am familiar with the information contained in this affidavit based on my personal participation in the investigation, my review of documents, my training and experience, an interview with the defendant ALDO BLAS, and discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography. Additionally, statements attributable to individuals herein are set forth in sum and substance.

THE INVESTIGATION

A. PEER TO PEER FILESHARING

3. Peer to peer file sharing ("P2P") is a method of communication available to Internet users through the use of special software. Computers linked together through the Internet using this software form a network that allows for the sharing of digital files between users on that network. A user first obtains the P2P software, which can be downloaded from the Internet. In general, P2P software allows the user to set up files on a

computer to be shared with others running compatible P2P software. A user obtains files by opening the P2P software on the user's computer, and conducting searches for files that are currently being shared on another user's computer.

4. The latest evolution of P2P software is a program that allows a user to set up his or her individual private P2P network of contacts. File sharing through this new and publicly available P2P file sharing program is limited only to other users who have been added to a private list of "friends." A new user is added to a list of friends by request. Acceptance of a friend request will allow that new user to download files from the user who sent the friend request. The new user can then browse the list of files that the other user has made available to download, select desired files from this list, and download the selected files. The downloading of a file occurs through a direct connection between the computer requesting the file and the computer containing the file.

5. One aspect of P2P file sharing is that multiple files may be downloaded in parallel, which permits downloading more than one file at a time.

6. A P2P file transfer is assisted by reference to an IP address. This address, expressed as four sets of numbers separated by decimal points, is unique to a particular computer during an online session. The IP address provides a unique location making it possible for data to be transferred between computers.

7. Third party software ("Network Monitoring Program" or "Investigative Software") is available to identify the IP address of the P2P computer sending the file. Such software monitors and logs Internet and local network traffic.

8. In order for the P2P networks to accomplish the reassembly of files described above, files being shared on the P2P network are processed through the client

software and, a hashed algorithm value ("hash value(s)") is computed for each file being shared, which uniquely identifies it on the network. A file processed by this hash algorithm operation results in the creating of an associated hash value often referred to as a digital signature, akin to a fingerprint. P2P software uses these hash values to determine whether files hosted on different computers with different names are, in fact, the same file.

9. The P2P program involved in this investigation uses the SHA-1 algorithm. SHA-1 is a mathematical encryption method developed by government agencies, including the National Security Agency, to assist in the unique identification of computer files. A file processed by SHA-1 operation results in the creation of an associated hash value that is unique for each file. As a result by comparing a SHA-1 hash values, it is possible to determine whether two files are the same regardless of their file names. SHA-1 has values provide a certainty exceeding 99.1% that two or more files with the same SHA-1 hash value are identical copies of the same file.

10. One investigative method employed in this investigation involves the use of Investigative Software ("IS") which is currently used in P2P file-sharing investigations to directly download files of child pornography from P2P network users. The IS is designed to "direct connect" to one IP address and browse or download from one specific P2P network user at a time. The IS locates files containing child pornography made available by P2P users by conducting searches for hash values of child pornography images and videos that have been identified as a result of other investigations.

B. PROBABLE CAUSE

11. On or about December 20, 2013, an HSI agent using the IS conducted searches of files on a P2P network for hash values of previously identified images and videos

containing child pornography. I have reviewed results of the searches. Based on the searches, I have learned that several files containing previously identified images and videos of child pornography were being made available for sharing by a computer with IP address 69.112.5.249.

12. On or about December 20, 2013,¹ an HSI agent using the IS and the P2P network downloaded the following files from the computer at IP address 69.112.5.249. The affiant has reviewed the downloaded image and video files. These files are described as follows:

- a. **"9yr laura sucks dad's dick and anal fuck.avi"** is a video, approximately three minutes and four second long, which depicts a nude prepubescent girl performing oral sex on an adult male's penis. The video then depicts the girl lying face down while the adult male attempts to insert his penis into the young girl's anus. The victim has been identified by law enforcement.
- b. **"(pthc) dori-(new compilation)_xvid(2)290.avi"** is a video, approximately four minutes and five seconds long, which begins by depicting two prepubescent girls. One of the girls is then shown exposing her genitals while an adult hand is seen holding a small paintbrush and rubbing the young girl's genitalia with the paint brush. The video then shows the adult hand using various objects on the girl including using a tweezer to pull on the girl's genitalia, inserting a toothpick in the child's anus and pressing a syringe needle against the skin around the girl's vagina.
- c. **"laura young new 0609 complete - 20m58s_pocketpc(2).avi"** is a video, approximately twenty minutes and fifty-nine seconds in length, which depicts a prepubescent girl being undressed by an adult male. The adult male begins to kiss the girl on her chest and vagina. The video then depicts the adult male attempting to have sex with the girl in multiple positions. The video concludes with the adult male assisting

¹ I have been advised by an Assistant United States Attorney that courts have held that in child pornography cases information in support of probable cause is often not deemed stale, even if months or years old, because collectors and traders of child pornography are known to store and retain their collections for extended periods of time, usually in their home and/or on their computer.

the young girl in getting dressed. The victim has been identified by law enforcement.

13. During the course of the investigation in this case, HSI agents accessed a website that provides registration information for IP addresses, which revealed that IP address 69.112.5.249 was registered to Cablevision Systems.

14. Records obtained from Cablevision Systems by administrative subpoena showed that December 20, 2013, the IP 69.112.5.249 was subscribed to "Aldo Blas." The address associated with this IP address and Aldo Blas was 365 Avenue W, Apt. 1, Brooklyn, NY 11223 (the "Premises").

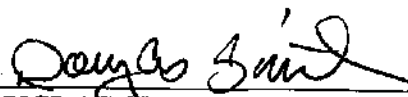
15. On or about April 25, 2014, the Honorable Robert M. Levy, United States Magistrate Judge, issued a warrant authorizing a search of the Premises.

16. The search warrant was executed on April 30, 2014, at approximately 6:00 a.m. The defendant ALDO BLAS answered the door. The defendant was repeatedly advised that he was not under arrest and that law enforcement agents had a warrant to search his residence. During the course of the search, law enforcement agents recovered, among other things, a black and white colored Dell laptop computer in a bedroom occupied by the defendant. The Dell laptop computer had two stickers on it, one over the battery indicating "Made in China" and one on the back indicating "Made in Malaysia."

17. The defendant ALDO BLAS advised law enforcement agents that he used this Dell laptop computer, and a female companion who shared the defendant's residence stated that only the defendant used this Dell laptop computer. The defendant admitted that he installed Ares, a P2P software, on this Dell laptop, as well as two other computers recovered during the search of his residence.

18. A cursory search of the Dell laptop computer by a Certified Forensic Analyst led to the recovery of approximately 10 video files depicting a minor engaged in sexually explicit conduct. HSI agents placed the defendant under arrest.

WHEREFORE, your deponent respectfully requests that the defendant ALDO BLAS be dealt with according to law.



DOUGLAS SMITH
Special Agent
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
30th day of April, 2014

HONORABLE MARILYN D. GO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK